

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA

SYDNEY McDUFFIE,)
v.)
Plaintiff,) CASE NO.:
ROBINSON AND WALDROP) 4:22-cv-00463-CLM
LANDSCAPE LLC, and)
JEREMY ROBINSON,)
Defendants.)

ANSWER

Jeremy Robinson and Robinson & Waldrop Landscape Group, LLC (“Robinson & Waldrop”) (collectively, “Defendants”) answer Sydney McDuffie’s Complaint as follows:

1. This paragraph is jurisdictional. Defendants do not challenge this court’s jurisdiction over McDuffie’s claims.
2. Admitted.
3. Admitted.
4. Admitted.
5. See above.
6. Admitted.
7. Generally admitted.
8. Admitted.

9. Generally admitted.

10. Denied.

11. Denied.

12. Denied.

13. Denied.

14. This allegation calls for a legal conclusion.

15. McDuffie's regular rate of pay is reflected on his paystubs, which have been produced.

16. McDuffie's regular rate of pay is reflected on his paystubs, which have been produced.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

23. Admitted.

24. Admitted.

25. Admitted.

26. Admitted.

27. Admitted.

28. Admitted.

29. Admitted.

30. Admitted.

31. Admitted.

32. Admitted.

33. This allegation calls for a legal conclusion.

34. Denied.

35. Denied.

36. Admitted.

37. Denied.

38. Denied.

39. Denied.

40. Admitted.

41. Admitted.

42. Admitted.

43. Admitted.

44. Admitted.

45. Admitted.

46. Admitted.

47. Admitted.

48. Admitted.

49. See above.

50. Admitted.

51. Denied.

52. Admitted.

53. Admitted.

54. Admitted.

55. Denied.

56. Denied.

57. Denied.

58. Defendants deny any material allegation not herein expressly admitted.

59. Defendants deny that they willfully violated the Fair Labor Standards Act.

60. Defendants are entitled to offset payment for work not performed for any proved unpaid wages.

/s/ William K. Hancock

William K Hancock

Laura L. Decker

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CERTIFICATE OF SERVICE

I hereby certify to the best of my knowledge this document was filed using the CM/ECF system and that notice of filing will be sent to registered participants as follows:

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/s/ William K. Hancock

OF COUNSEL